

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**LISA YAZZIE and  
ERNEST YAZZIE,**

**Plaintiffs,**

**v.**

**No. 1:16-CV-01085-KK-LF**

**GOVERNMENT EMPLOYEES  
INSURANCE COMPANY, DARCELL  
ELMORE, and MICHAL ELLIS,**

**Defendants.**

**STIPULATED MOTION TO AMEND  
THE CASE MANAGEMENT DEADLINES**

The Parties by and through their respective counsel of record jointly move this Court to amend the case management deadlines. As grounds for the Motion, the parties state as follows:

1. Pursuant to the Court's Scheduling Order, Plaintiffs' expert disclosures are currently due November 10, 2017. Defendants' expert witness disclosures are due December 11, 2017.
2. The parties have conducted significant discovery. Plaintiffs intend to take their final non-expert deposition of GEICO's designated representative pursuant to Fed. R. Civ. P. 30(b)(6) on November 29, 2017.
3. In light of the aforementioned upcoming deposition and to make disclosures as complete and efficient as possible, the parties request the Court amend the case management deadlines as follows:
  - a. Plaintiffs' Rule 26(a)(2) expert disclosures will be due December 15, 2017.
  - b. The Defendants' Rule 26(a)(2) expert disclosures will be due January 25, 2018.
  - c. Termination date of discovery shall be January 19, 2018.

- d. Motions relating to discovery to be filed no later than January 26, 2018.
  - e. Termination date for depositions of expert witnesses shall be March 14, 2018.
  - f. Pretrial motions other than discovery motions, including motions which require a Daubert hearing due March 23, 2018.
  - g. Proposed Pretrial Order: Plaintiffs to Defendants April 9, 2018; and Defendants to Court April 19, 2018.
4. Trial is scheduled to begin July 9, 2018.

WHEREFORE, the parties pray the Court enter an Order Amending the Case Management Deadlines.

Respectfully submitted,

BARBER & BORG, LLC

/s/ Nathan S. Anderson

Nathan S. Anderson

P.O. Box 30745

Albuquerque, NM 87190

(505) 884-0004

Attorneys for Plaintiff

CHAPMAN AND PRIEST, PC

Electronically Approved

Stephen M. Simone

PO Box 92438

Albuquerque, NM 87199-2438

505-242-6000

Attorneys for Defendant GEICO

ALLEN, SHEPHERD, LEWIS & SYRA, P.A.

*Electronically Approved*\_\_\_\_\_

Daniel W. Lewis  
Laura K. Vega  
Tiffany Owens  
P.O. Box 94750  
Albuquerque, NM 87199-4750  
505-341-0110  
Attorneys for Defendant GEICO

**PERRY LAW, PC**

*Electronically Approved*\_\_\_\_\_

Meloney Perry,  
Stacy Thompson  
10440 N. Central Expressway, Suite 600  
Dallas, Texas 75231  
Telephone: (214) 265-6201  
Facsimile: (214) 265-6226  
E-mail: [mperry@mperrylaw.com](mailto:mperry@mperrylaw.com)  
[sthompson@mperrylaw.com](mailto:sthompson@mperrylaw.com)  
Attorneys for Defendant Elmore